



February 1, 1999

Ms. Chere Shorter  
Process Products Branch  
Fruit and Vegetable Programs  
AMS, USDA  
Stop 0247  
P O Box 96456  
Washington, DC 20090-6456

Dear Ms. Shorter:

We are opposed to the proposed changes of canned mushroom grading standards that would lower the ratio of drained weight to net weight to 56% for the 8 oz, Jumbo, and #10 can sizes. We feel this change would be bad for the industry and customers for the following reasons:

1. Changing sizes and allowing new drained weights would be confusing to users. There would likely be a much larger number of pack sizes available – all within the narrow range of the 56% to 62% drained weight ratio. This change would be confusing to users. The Agricultural Marketing Act of 1946 directs the Secretary of Agriculture to “encourage uniformity and consistency in commercial practices.” This change would encourage lack of uniformity.
2. This change might require expensive changes in processing. If manufacturers change pack sizes, there would be expenses for heat penetration studies, new labels, and new in-plant procedures.
3. AMS suggests that this change would provide a more equitable marketing environment and improve quality by reducing overfill. We disagree. We feel that the marketing environment would become more confused and not more equitable. Also, we believe there are no consistent problems with overfill under the current drained weight standards. Therefore, this change would address areas that are not problems.

On another matter, we request that USDA review the grade standards for minimum color requirements under various grade classifications. We think this review is justified due to the increasing use of glass containers in retail sizes and the extreme difficulty of achieving Grade A color in glass.

MONTEREY MUSHROOMS, INC.  
Corporate Office • 260 Westgate Drive  
Watsonville, California 95076  
408/763-5300 • FAX 408/763-2300

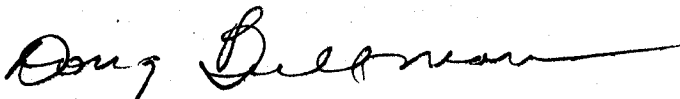
Ms. Chere Shorter  
February 1, 1999  
Page 2

When the color standards were developed, most mushrooms were packed in cans. In cases where the inside of the can is not varnished, the mushrooms take on a light yellow color caused by a reaction between the tin and brine solution. This color is usually considered #1 or #2 in the color standards.

In glass, this reaction does not occur. As a result, even the best quality mushrooms packed in glass can seldom be rated Grade A – unless a bleaching agent is used. Thus, we are in a position of feeling the necessity of using a bleaching agent to achieve the Grade A standard. Also, as far as we know, no significant packer is consistently achieving a Grade A rating in mushrooms packed in glass.

We recommend a review of this standard so that the industry is not forced to use bleaching agents in mushrooms packed in glass to achieve a Grade A rating.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Doug Bullman", with a long horizontal flourish extending to the right.

Douglas A. Bullman  
Vice President